

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

MARK CHANGIZI,)	
MICHAEL P. SENGER,)	
DANIEL KOTZIN,)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No.: 2:22-cv-01776
)	
DEPARTMENT OF HEALTH AND)	
HUMAN SERVICES;)	
VIVEK MURTHY, United States)	MOTION FOR A PRELIMINARY
Surgeon General in his)	INJUNCTION
official capacity, and)	
XAVIER BECERRA,)	
Secretary of the Department)	
of Health and Human Services)	
in his official capacity,)	
)	
<i>Defendants.</i>)	

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

COME NOW Plaintiffs Mark Changizi, Michael P. Senger, and Daniel P. Kotzin. Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiffs move for a Preliminary Injunction against Defendants: the Department of Health and Human Services (HHS), United States Surgeon General Vivek Murthy, and Secretary of HHS Xavier Becerra (collectively, "Defendants").

Plaintiffs ask this Court to preliminarily enjoin Defendants from continuing to demand that technology companies censor and ban users who articulate views that depart from the Government's messaging on COVID-19, to threaten them with adverse action if they do not comply, and to retract the March 3, 2022 Request for Information (RFI).

As explained more thoroughly in Plaintiffs' Complaint and the Memorandum in support of this Motion, time is of the essence and Plaintiffs will suffer irreparable harm without urgent,

emergency injunctive relief from this Court. Respectfully, Plaintiffs ask this Court to grant expedited relief on the papers and/or hold a hearing on Plaintiffs' request for injunctive relief as soon as practicable. Plaintiffs respectfully request oral argument because of the complexities and importance of the issues in this case.

WHEREFORE, Plaintiffs respectfully request that the Court grant the foregoing Motion and enter the proposed Preliminary Injunction.

Respectfully submitted,

/s/ Angela Lavin

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